

February 16, 2011

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks, RM-11592

In the Matter of Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers Automatic and Manual Roaming Obligations Pertaining to Commercial Mobile Radio Services, WT Docket 05-265

Dear Ms. Dortch:

Cellular South, Inc. ("Cellular South") submits this *ex parte* noting recent reported statements by Randall Stephenson, Chairman of AT&T, which appear to indicate AT&T's change in position regarding the need for interoperability.

According to industry press reports, including the enclosed Computer World article, Mr. Stephenson made the following statements regarding interoperability during a presentation yesterday at the Mobile World Congress in Barcelona, Spain (emphasis added):

- "AT&T is committed to the world's most advanced network, and **we want it the most open and highly available** and easily addressable."
- "If our object is to grow the [wireless] pie, **interoperability is necessary.**"
- "Spectrum is going to play a huge role [globally], especially as we move to 4G. It's most important that **regulators have to be aware of this if we want to create interoperability across geographies** and countries."
- "The **customer expectation for an open and seamless [wireless] environment will only increase** and the more we facilitate that openness, [the better]."
- "**An open and interoperable environment ... will drive mobile broadband** and mobile broadband with the cloud will drive the next wave."

Cellular South and the other members of the Good Faith Purchasers Alliance (GFPA) agree with these comments. In fact, over the last seventeen months we have consistently urged the Commission to act on the GFPA's September 29, 2009 Petition for Rulemaking for many of the same reasons articulated by AT&T's Mr. Stephenson.¹

Interoperability will enable seamless 4G coverage across the United States by ending Verizon's and AT&T's ability to wall-off their essentially proprietary Band Class 13 (AT&T) and Band Class 17 (Verizon) 700 MHz LTE networks from the customers of smaller, competitive carriers that hold Band Class 12 700 MHz licenses. In his reported comments, Mr. Stephenson makes the same point, saying: "The customer expectation for an open and seamless [wireless] environment will only increase and the more we facilitate that openness, [the better]."

Such seamless access (paired with a data roaming obligation²) will facilitate faster and broader expansion of the mobile broadband market – resulting in economic growth and job creation. As more carriers gain the certainty of nation-wide access that is necessary to obtain and deploy the capital needed for upgrading and expanding their networks – building towers and retail locations – economic growth and job creation will immediately result. Again, AT&T's Mr. Stephenson could not make our point more clearly, saying: "If our object is to grow the [wireless] pie, interoperability is necessary," and "[s]pectrum is going to play a huge role [globally], especially as we move to 4G. It's most important that regulators have to be aware of this if we want to create interoperability across geographies and countries."

Cellular South welcomes AT&T's support for interoperability and Mr. Stephenson's explicit recognition of the positive economic impacts this simple change in public policy could have on the entire mobile broadband marketplace.

Sincerely,

/s/ Eric Graham

Eric Graham
Vice President, Strategic and Government Relations

Enclosure

cc: Ruth Milkman, Chief, Wireless Telecommunications Bureau
James Schlichting, Senior Deputy Chief, Wireless Telecommunications Bureau

¹ Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks, RM-11592 (filed September 29, 2010) ("Petition for Rulemaking").

² See, e.g., Cellular South's February 9, 2011, *ex parte* submission in this same proceeding, at p. 3.